



# Association of Veterinarians for Animal Rights

Committed to balancing the needs of nonhuman animals with those of human animals

National Office: P.O. Box 208, Davis, CA 95617-0208 • Voice 530.759.8106 Fax 530.759.8116  
E-mail: AVAR@igc.org • URL: <http://AVAR.org>

Docket No. 98-045N3  
USDA/FSIS Hearing Clerk  
300 12<sup>th</sup> St., S.W., Room 102  
Cotton Annex  
Washington, D.C. 20250-3700

April 17, 2000

Docket No. 00N-0504  
FDA/Dockets Management Branch (HFA-305)  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

To Whom It May Concern:


I recently attended the public hearing in Sacramento, California, on egg safety. While government agencies should be applauded for many of the steps taken to eliminate *Salmonella enteritidis* (Se) in commercial eggs, I am quite concerned about the negligent response to the issue of forced molting. Additional research on forced molting is part of the plan to reduce Se in eggs. However, this lack of acceptance of the already-existing research on the effects of forced molting on egg laying hens appears to be an effort to maintain the status quo. The USDA has already concluded that eliminating forced molting will reduce human illness by 2.1 percent. The Pennsylvania Egg Producers conducted their own pilot study in the field and also came to the conclusion that forced molting is a factor in Se shedding in laying hens. Additionally, there are numerous studies and ample information available on the deleterious effects of starvation and malnutrition in many species, including humans. Will putting hundreds more hens in cages and starving them help your agencies determine the morality of taking food away from animals who normally eat all day?

While we recognize that scientific information is necessary to make decisions regarding the outbreaks of bacterial infections, there is also the issue of setting government policy according to common sense and human decency. For our government agencies to allow or accept forced molting, an intentional practice of withholding food in order to force birds to lose weight and thereby financially benefit the egg laying industry, does not speak well of our desire to promote a respect for life or compassion in our society. The message being given to children is that it is acceptable to treat other living beings with callous regard as long as humans benefit.

State legislators are taking a look at this issue from a different perspective; i.e., that forced molting is bad for the birds and bad for consumers of commercial eggs. It is a root problem for Se contamination and a root problem of our lack of acknowledgment that birds are sentient beings and that their suffering must be taken into consideration by our government agencies.

Please take steps to eliminate forced molting on a federal level -- it is a part of the problem of Se contamination in eggs and it is cruel.

With reverence for all life,

  
Teri Barnato, M.A.  
National Director

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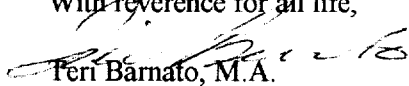
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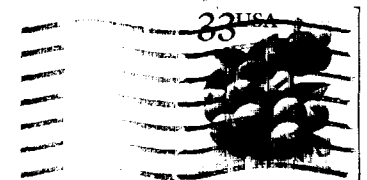
  
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